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R-041-207 .2

DISAPPROVAL OF REMOVAL ACTION 31 (30) WORK PLAN

03/08/95

USEPA

DOE-FN

4

COMMENTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF:

MAR 08 1995

Mr. Jack R. Craig
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

HRE-8J

RE: Disapproval of Removal Action 30
Work Plan

Dear Mr. Craig:

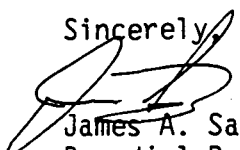
The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) Removal Action (RA) 30 Work Plan for Seepage Control at the South Field and Inactive Flyash Pile. This RA proposes to reduce impacts on the Great Miami Aquifer by controlling seepage from the South Field and Inactive Flyash Pile.

Although, U.S. EPA supports the RA, two issues need to be immediately addressed. First, the work plan fails to provide any methodology for determining the effectiveness of the RA. Second, combining the disturbed and removed soils from RA 30 with Operable Unit 5 soils, currently managed in an existing stockpile, violates RA 17. All soils must be managed in accordance with RA 17.

Therefore, U.S. EPA hereby disapproves the RA 30 work plan pending incorporation of acceptable responses to comments and associated changes in the work plan. A revised RA work plan with responses to comments must be submitted to U.S. EPA within thirty (30) days receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions.

Sincerely,


James A. Saric
Remedial Project Manager
Technical Enforcement Section #1
RCRA Enforcement Branch

Enclosure

cc: Tom Schneider, OEPA-SWDO
Jack Baublitz, U.S. DOE-HDQ
Don Ofte, FERMCO
Jim Thiesing, FERMCO
Terry Hagen, FERMCO



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TECHNICAL REVIEW COMMENTS ON THE WORK PLAN
FOR REMOVAL ACTION 31 (30)
FERNALD ENVIRONMENTAL MANAGEMENT PROJECT (FEMP)

GENERAL COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Pg. #: NA Line #: NA
Original General Comment #: 1

Comment: The work plan does not provide any method for determining the effectiveness of the removal action (RA). The engineered design information for the seepage control system is not detailed, and failure of the system is predicted without any determination of the impacts of these failures on future contaminant transport and further degradation of the Great Miami Aquifer (GMA). The system is designed only to intercept seeps during dry periods or periods of light precipitation. Whenever precipitation levels exceed the design capacity of the system, overflow of runoff will occur. The text reasons that during periods of system failure, the most contaminated runoff would be captured, and any contamination in the overflow would be diluted; however, entrained sediment in the overflow is not considered. Past meteorological precipitation data should be reviewed to determine the expected failure frequency and to estimate the system's overall effectiveness, both from the perspective of uranium concentration in the overflow seepage and uranium mass in the overflow seepage. If possible, the system design should be revised so that the system design minimizes the possibility of system failure. These items should be addressed in the work plan.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Pg. #: NA Line #: NA
Original General Comment #: 2

Comment: The text does not state how the RA will contribute to the efficient performance of the long-term remedial action goals for operable unit 2 (OU 2) or how the RA will relate to the overall site management strategy. These items should be addressed in the work plan.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Pg. #: NA Line #: NA
Original General Comment #: 3
Comment: The work plan states that sediment removed from the south field and soil removed to construct the seepage control system will be stored in a controlled stockpile under the provisions of RA 17. However, placement of OU 2 material within an OU 5 stockpile deviates from procedures presented in RA 17. The exceptions to RA 17 as stated in the work plan appear reasonable as long (1) the material from OU 2 and OU 5 have similar contaminants and contaminant levels, (2) the materials from both OUs have the same proposed remedial action, and (3) the placement of the OU 2 material does not jeopardize future disposal options for the material in the stockpile.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Pg. #: NA Line #: NA
Original General Comment #: 4
Comment: The work plan does not discuss any formal reporting requirements to document the progress of the RA. The work plan should discuss a report that describes all RA activities, final system as-built drawings, and a determination of the system effectiveness. In addition, the work plan should provide for periodic reports to U.S. EPA regarding the volume of seepage and surface water collected and treated and sediment collected and stockpiled.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Pg. #: NA Line #: NA
Original General Comment #: 5
Comment: The work plan proposes to combine all excavated soils into one controlled stockpile. However, no field screening is proposed to determine whether the soils can be combined and whether they can be stored in controlled stockpiles based on their radiological contaminant levels. Provisions for the field testing of soils should therefore be added to the work plan.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Pg. #: NA Line #: NA
Original General Comment # 6
Comment: The RA is incorrectly numbered as RA 31. This RA is actually RA 30, not RA 31. Appendix C, "Removal Action No. 30: Seepage Control At The South Field And Inactive Fly Ash Pile Evaluation Of Alternatives," correctly refers to this as RA 30.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.2 Pg. #: 2-4 Line #: 42 to 43
Original Specific Comment #: 1
Comment: The work plan states that the sumps will be inspected on a regular basis, and if sediment is found at unacceptable volumes, it will be removed and placed in a controlled stockpile. However, the text does not discuss the frequency of inspections, volume of sediment considered unacceptable, removal techniques, and method to determine whether the removed sediment can be deposited at a controlled stockpile based on the level of contamination. If this information is not contained in the work plan, it should be included in the RA operations and maintenance plan.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.4 Pg. #: 2-8 Line #: 3 to 8
Original Specific Comment #: 2
Comment: Section 2.4 discusses the integration of the RA with remediation activities. Section 2.4 does not discuss the remedial action proposed for OU 2, how the RA will be integrated into the final remedial action for OU 2, and how the RA will relate to the overall site management strategy. This information should be added to Section 2.4 of the work plan.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 8.2 Pg. #: 8-2 Line #: 40 to 42
Original Specific Comment #: 3
Comment: Section 8.2 discusses action-specific applicable or relevant and appropriate requirements (ARARs) and to be considered (TBC) actions. The control method for particulate and fugitive dust generated during the removal action should also be described in this section.